

Comments from Sierra Wireless on ET Docket No. 15-170

Date: October 9, 2015

- We support the proposal in para. 18 to merge the DoC and verification procedures into a single procedure (SDoC). We agree that an accredited testing laboratory should not be required for performing the testing for any device that is subject to SDoC.
- We support the proposed changes to *47CFR2.1043 Changes in certified equipment*. We propose to allow Class I permissive changes to include changes to collocated radio devices when RF exposure parameters are affected, provided the combined MPE/SAR values remain within limits. (para. 53)
- We support the 1st method proposed in para. 63, i.e. the party installing a previously certified modular transmitter into an end product should submit an application for certification and obtain a new FCC ID for the end product, because the integrator, not the module manufacturer should be responsible for the end product. By only allowing the 1st method proposed in para. 63, all the issues in paras. 67 and 106 will no longer exist. Combined with the proposal in para. 78, there's no need for any integrator to use the 2nd method. We don't support the 2nd method proposed in para. 63, i.e. 2) the grantee(s) of the certified modular transmitter(s) could modify the original grant(s) of certification to allow for such an integration into a host device under the original FCC ID(s), because it would create issues identified in paras. 67 and 106.
- We agree with the proposal in para. 66 to designate the certified modular transmitter grantee or the host provider as responsible for the end products that can be created by consumers who purchase such equipment, on the condition that the instruction for proper installation and use of device is strictly followed.
- We support the proposal in para. 78 to permit the new responsible parties to refer to test data submitted in the original grantee's filing. We think the applicant should be able to reference all exhibits of the original grant of certification where applicable and not have to resubmit them with the new application for certification. When the 1st method proposed in para. 63 is used, the new responsible party does not need permission from the original grantee in order to reference the exhibits of the original grant of certification.
- We support the proposal in para. 88 to provide long-term confidentiality automatically (*i.e.* without specific justification) for certain application exhibits for all equipment authorizations.